

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY
LITIGATION (NO. VI)

Civil Action No. MDL 875

This Document Relates to:

Phillip Wayne Moore and Martha Jane Henderson
Moore, spouse,

Plaintiffs,

vs.

District of South Carolina
Civil Action No. 0:10-cv-546

3M Company f/k/a Minnesota
Mining and Manufacturing
Company;
A.W. Chesterton Company;
Alfa Laval, Inc;
Aurora Pump;
Bayer Cropscience, Inc.,
individually and as successor
to Aventis Cropscience USA,
INC. f/k/a Rhone-Poulence AG
CO. f/k/a Amchem Products, Inc.;
Blackmer Pump;
Buffalo Pumps, Inc.;
BW/IP Inc., a subsidiary of
Flowserve Corporation;
Carrier Corporation;
CBS Corporation, (f/k/a Viacom, Inc.,
successor by merger to CBS Corporation, f/k/a
Westinghouse Electric Corporation);
CertainTeed Corporation;
Cleaver-Brooks, Inc.;
Crane Co.;
CROWN Cork & Seal USA, Inc.;
Curtiss-Wright Corporation;
Curtiss-Wright Flow Control
Corporation, Individually and
as Successor of Farris Valves
and/or Sprague Pumps;
Eaton Corporation,
individually and as
succesor-in-interest to Cutler

COMPLAINT

Hammer, Inc.;

Flowserve Corporation,
individually and as successor
to Anchor/Darling Valve Company;

Flowserve Corporation,
individually and as successor
to Duriron Co., Inc., and
Durco International Inc.;

Flowserve US Inc.,
individually and as successor
to Edward Valves Inc., Vogt
Valve Company, and Nordstrom
Valves, Inc.;

Fluor Daniel Services Corporation;
Fluor Daniel, Inc.;

Foster Wheeler Energy Corporation;
Gardner Denver, Inc.;

Garlock Sealing Technologies,
LLC;

General Electric Company;
General Refractories Company;

Georgia-Pacific LLC, f/k/a
Georgia-Pacific Corporation;

Goulds Pumps, Inc.;

Grinnell LLC, (f/k/a Grinnell Corp)

IMO Industries, Inc.;

Ingersoll-Rand Company;

ITT Corporation, individually
and as successor in interest
to Kennedy Valve Manufacturing
Company;

ITT Corporation, individually
and as successor to Bell & Gossett;

Metlife Inc.;

National Services Industries,
Inc. (f/k/a North Brothers
Company) and North Brothers
Corporation;

Patterson Pump Company;

Rapid American Corporation;

Riley Power, Inc., f/k/a
Babcock Borsig Power, Inc.,
f/k/a/ D.B. Riley, Inc., f/k/a
Riley Stoker Corporation;

Robertshaw Controls Company,
Individually and as successor

to Fulton Sylphon Company;
SEPCO Corporation;
The J.R. Clarkson Company
solely as a successor by
merger to Anderson Greenwood &
Co. f/k/a J.E. Longergan Co.;
The J.R. Clarkson Company
solely as a successor by
merger to Anderson Greenwood &
Co. f/k/a Kunkle Valve Company, Inc.;
The J.R. Clarkson Company
solely as a successor by
merger to Crosby Valve, Inc.;
Trane U.S. Inc., f/k/a
American Standard Inc.;
Unifrax I LLC f/k/a Unifrax
Corporation f/k/a The
Carborundum Company, d/b/a
North American Ceramic Fibers;
Union Carbide Corporation;
Uniroyal, Inc., f/k/a/ United
States Rubber Company, Inc;
Viking Pump, Inc.;
Warren Pumps LLC;
Yarway Corporation;
Zurn Industries, LLC

Defendants

Plaintiffs hereby adopt and incorporate Plaintiffs' Master Long Form Complaint in
Re: Asbestos Litigation in the United States District Court for the Eastern District of
Pennsylvania, filed as Miscellaneous No. 86-0457. Pursuant to the August 20, 1986 Order
of this Court, the following short-form Complaint is utilized in this asbestos action:

1. The Plaintiffs are: Phillip Wayne Moore, the Injured Plaintiff (“plaintiff-worker”) and Martha Jane Henderson Moore (“plaintiff spouse”). Plaintiff’s Address, Social Security Number, and Date of Birth information is available upon request.

2. The Court has jurisdiction of this matter pursuant to the Multidistrict Litigation Order dated July 29, 1991, Civil Action No. MDL 875. Moreover, the Plaintiffs are citizens of the State of South Carolina and no defendant is a citizen or has a principal place of business in the State of South Carolina. Further, the amount in controversy, exclusive of interest and costs, exceeds \$100,000.00.

3. The Defendants are those companies listed in the caption.

4. Plaintiffs hereby incorporate by reference the following counts from the Master Long-Form Complaint: Counts I, II, III, IV and V.

5. Plaintiff-worker's asbestos employment history, including, to the extent possible at this time, the asbestos products to which plaintiff-worker was exposed is attached hereto as Schedule I.

6. Plaintiff-worker was diagnosed with Asbestosis by David A. Schwartz MD on 04/27/07.

7. Plaintiffs hereby demand a trial by jury on all issues of fact.

Respectfully submitted,

WALLACE AND GRAHAM, P.A.

s/Mona Lisa Wallace

Attorney for Plaintiff
WALLACE & GRAHAM, P.A.
525 North Main Street
Salisbury, NC 28144
Tel. No. (704) 633-5244
Fax: (704) 633-9434
E-Mail: mwallace@wallacegraham.com

Date: 03/05/10

Phillip Wayne Moore
SCHEDULE I
Plaintiff-Worker Employment History
Asbestos Exposure Worksite Information

OCCUPATION:

Bag boy, clerk
Construction, Power House Mechanic (Instrumentation Dept.)
Maintenance, Construction Instrument and Electric Technician
Student - no degree
Truck Driver/ Ammo Handler
Worked around abatement crews building enclosures

EMPLOYER/WORKSITE:
DATES:

APPROXIMATE

Community Cash Stores Inc. - Spartanburg, SC	09/01/67 - 04/01/70
University of South Carolina - Spartanburg, SC	09/01/67 - 05/31/68
National Guard Reserves - South Carolina	01/01/69 - 12/31/75
Duke Energy Corporation - Oconee	04/20/70 - 12/31/73
Duke Energy Corporation - Belews Creek	01/01/73 - 12/31/74
Duke Energy Corporation - McGuire	01/01/74 - 12/31/78
Duke Energy Corporation - Catawba	01/01/78 - 12/31/87
Duke Energy Corporation - Allen	01/01/87 - 12/31/88
Duke Energy Corporation - Catawba	01/01/88 -

SMOKING HISTORY:

Never;

PRODUCTS CONTAINING ASBESTOS:

Raw Asbestos Fiber, Pipe Covering, Block, Cements, Gaskets, Refractory Materials, Boilers, Joint Compounds, Wall Board, and other asbestos containing materials.

DEPENDENTS:

None

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SC DEFENDANTS LIST

3M Company f/k/a Minnesota Mining and Manufacturing Company
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

A.W. Chesterton Company
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Alfa Laval, Inc
5400 International Trade Dr
Richmond, VA 23231

Aurora Pump
Lynette Jones
13515 Ballantyne Corp Pl
Charlotte, NC 28277

Bayer Cropscience, Inc., individually and as successor to Aventis Cropscience USA,
INC. f/k/a Rhone-Poulence AG CO. f/k/a Amchem Products, Inc.
Corporation Service Company - SC
1703 Laurel St
Columbia, SC 29203

Blackmer Pump
1809 Century Ave SW
Grand Rapids, MI 49503-1530

Buffalo Pumps, Inc.
874 Oliver St
North Tanawanda, NY 14120-3298

BW/IP Inc., a subsidiary of Flowserve Corporation
Flowserve Legal Department 5212 N. O'Connor Blvd
Irving, TX 75039

Carrier Corporation
CT Corp System
2 Office Park CT Ste 103

Columbia, SC 29223

CBS Corporation
Corporation Service Company - SC
1703 Laurel St
Columbia, SC 29203

CertainTeed Corporation
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Cleaver-Brooks, Inc.
11950 W Lake Park Dr
Milwaukee, WI 53224

Crane Co.
Corporation Trust Company
1209 Orange Street
Wilmington, DE 19801

CROWN Cork & Seal USA, Inc.
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Curtiss-Wright Corporation
10 Waterview Blvd. 2ND Flr
Parisippa, NJ 07054

Curtiss-Wright Flow Control Corporation
CT Corporation System - SC
2 Office Park CT Ste 103
Columbia, SC 29223

Eaton Corporation, individually and as successor-in-interest to Cutler Hammer, Inc.
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Flowserve Corporation, individually and as successor to Anchor/Darling Valve Company
5215 N. O'Connor Blvd. Ste 2300
Irving, TX 75039

Flowserve Corporation, individually and as successor to Duriron Co., Inc., and Durco
International Inc.

5215 N. O'Connor Blvd. Ste 2300
Irving, TX 75039

Flowserve US Inc., individually and as successor to Edward Valves Inc., Vogt Valve
Company, and Nordstrom Valves, Inc.
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Fluor Daniel Services Corporation
Corporation Service Company - SC
1703 Laurel St
Columbia, SC 29203

Fluor Daniel, Inc.
Corporation Service Company - SC
1703 Laurel St
Columbia, SC 29203

Foster Wheeler Energy Corporation
CT Corporation System - SC
2 Office Park CT Ste 103
Columbia, SC 29223

Gardner Denver, Inc.
Corporation Service Company - NY
80 State St
Albany, NY 12207

Garlock Sealing Technologies, LLC
1666 Division St
Palmyra, NY 14522

General Electric Company
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

General Refractories Company
1 Bala Ave. Suite 310
Bala Cynwyd, PA 19004

Georgia-Pacific LLC, f/k/a Georgia-Pacific Corporation
CT Corporation System - SC
2 Office Park CT Ste 103
Columbia, SC 29223

Goulds Pumps, Inc.
240 Falls St
Seneca Falls, NY 13148

Grinnell LLC, (f/k/a Grinnell Corp)
Corporation Trust Company
1209 Orange Street
Wilmington, DE 19801

IMO Industries, Inc.
1009 Lenox Dr Bldg. 4 West
Lawrenceville, NJ 08648

Ingersoll-Rand Company
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

ITT Corporation, individually and as successor in interest to Kennedy Valve
Manufacturing Company
CT Corporation System
111 Eighth Ave
New York, NY 10011

ITT Corporation, individually and as successor in interest to Bell & Gossett
CT Corporation System - NY
111 Eighth Ave
New York, NY 10011

Metlife Inc.
200 Park Ave.
New York, NY 10166

National Services Industries, Inc.
Corporation Service Company - GA
40 Technology Parkway S Ste 300
Norcross, GA 30092

Patterson Pump Company
CT Corporation System - SC
2 Office Park CT Ste 103
Columbia, SC 29223

Rapid American Corporation
Corporation Service Company - DE
2711 Centerville Rd Ste 400
Wilmington, DE 19808

Riley Power, Inc.
CT Corporation System - SC
2 Office Park CT Ste 103
Columbia, SC 29223

Robertshaw Controls Company,
1602 Mustang Dr
Maryville, TN 37801

SEPCO Corporation
CT Corporation System - CA
818 W Seventh St
Los Angeles, CA 90017

The J.R. Clarkson Company solely as a successor by merger to Anderson Greenwood &
Co. f/k/a J.E. Longergan Co.
The Corporation Trust Company of Nevada
311 S. Division St.
Carson City, NV 89703

The J.R. Clarkson Company solely as a successor by merger to Anderson Greenwood &
Co. f/k/a Kunkle Valve Company, Inc.
The Corporation Trust Company of Nevada
311 S. Division St.
Carson City, NV 89703

The J.R. Clarkson Company solely as a successor by merger to Crosby Valve, Inc.
The Corporation Trust Company of Nevada
311 S. Division St.
Carson City, NV 89703

Trane U.S. Inc., f/k/a American Standard Inc.
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Unifrax I LLC
2351 Whirlpool St
Niagara Falls, NY 14305

Union Carbide Corporation
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223

Uniroyal, Inc., f/k/a/ United States Rubber Company, Inc
70 Great Hill Rd
Naugatuck, CT 06770

Viking Pump, Inc.
406 State St
Cedar Falls, IN 50613-0008

Warren Pumps LLC
PO Box 969
Warren, MA 01083-0969

Yarway Corporation
C.T. Corporation
116 Pine St. Suite 320
Harrisburg, PA 17101

Zurn Industries, LLC
CT Corp System
2 Office Park CT Ste 103
Columbia, SC 29223